UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION

Malikie Innovations Ltd. and
Key Patent Innovations Ltd.,

Plaintiffs,

v.

MARA Holdings, Inc. (f/k/a Marathon Digital Holdings, Inc.)

Defendant.

Case No. 7:25-cv-00222-DC-DTG
JURY TRIAL DEMANDED

ERRATA TO THE EXPERT DECLARATION OF DR. ÇETIN KAYA KOÇ IN SUPPORT OF MARA'S OPENING CLAIM CONSTRUCTION BRIEF

I, Dr. Çetin Kaya Koç, provides the following errata to clarify and/or correct my December 17, 2025 Expert Declaration in support of Defendant MARA Holdings, Inc.'s Opening Claim Construction Brief:

Paragraph	Original Language	Corrected Language
16	Exhibit E U.S. Patent No. 8,788,827 B2 to Marinus Struik et al. (filed September 14, 2012, issued July 22, 2014)	Exhibit E U.S. Patent No. 8,788,827 B2 to Marinus Struik et al. (filed September 14, 2012, issued July 22, 2014) Exhibit F U.S. Patent No. 10,284,370 B2 to Marinus Struik et al. (filed June 27, 2014, issued May 7, 2019)
76	Calculating 5 – 6 mod 19: subtracting 6 from 5 generates an unreduced result –1. Performing modular reduction on the unreduced result –1 (i.e., –1 mod 19) yields a reduced result 18, who's bit-length is more than the unreduced result, not lowered	Calculating 5 – 6 mod 19: subtracting 6 from 5 generates an unreduced result –1. Performing modular reduction on the unreduced result –1 (i.e., –1 mod 19) yields a reduced result 18, who's bit-length is the same as the unreduced result, not lowered.

76	[3] Under a typical method to represent negative integers in binary called two's complement, –1 is represented as 11 and 18 is represented as 010010.	[3] Under a typical method to represent negative integers in binary called two's complement, –1 is represented as 111111 and 18 is represented as 010010.

Dated: January 7, 2026

Dr. Çetin Kaya Koç